

# EXHIBIT A

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**From:** Seth Carson <seth@dereksmithlaw.com>  
**Sent:** Monday, November 2, 2020 9:29 PM  
**To:** Sidney Gold; Walton, David; Bill Rieser; Cavalier, Jonathan; Benson, Leigh Ann  
**Subject:** Lisa Barbounis v. MEF, et al.

**\*\*EXTERNAL SENDER\*\***

Counsel,

Below is a link to the MEF Docs Shared Folder. I also included a password below to access to information in that folder.

Inside the MEF folder there is a folder labeled □Lisa Barbounis□

I am placing documents inside that folder including Plaintiff's Written Responses to Defendants' Request for Production of Documents. I am also placing Plaintiff's Expert Report. I am also placing some files that I believe you have already received through Plaintiff's e-discovery, however, I want to make sure you have everything that Plaintiff might use in the upcoming depositions.

<https://www.dropbox.com/sh/n3nk7r57d8ykhet/AABYHy57HmUFM8IIa3VjjeLTa□dl□0>



## Dropbox - Password Required

Dropbox is a free service that lets you bring your photos, docs, and videos anywhere and share them easily. Never email yourself a file again!

[www.dropbox.com](https://www.dropbox.com)

Password: MEFdocs123

Seth D. Carson, Esquire  
Derek Smith Law Group, PLLC  
1835 Market Street  
Suite 2950  
Philadelphia, PA 19103  
Phone: 215.391.4790  
Facsimile: 215.893.5288  
Direct: 484.678.2210  
Email: Seth@DerekSmithLaw.com

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# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS	:	CIVIL ACTION
	:	
Plaintiff,	:	NO. 2:19-cv-05030-JDW
	:	
-vs-	:	
	:	
THE MIDDLE EAST FORUM, et al.	:	
	:	
Defendants.	:	

**PLAINTIFF LISA BARBOUNIS'S RESPONSES TO  
DEFENDANTS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

1. All documents identified or referenced in response to Defendants' First Set of Interrogatories.

Response:

Plaintiff, Lisa Barbounis has produced documents in connection with Defendants' First Request for Production of Documents including the following documents, the Bates Stamps and description of each set of documents is listed below.

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.
- ☐ MEF Docs 000052 through 000073: text thread between Delaney Yonchek and Patricia McNulty (29 images were also produced that were part of this thread).
- ☐ MEF Docs 000074 through 000103: text thread between Delaney Yonchek, Patricia McNulty, and Lisa Barbounis.
- ☐ MEF Docs 000104 through 000226: text thread between Delaney Yonchek and Lisa Barbounis (146 images were produced that were part of this thread).
- ☐ MEF Docs 000227 through 000461: Articles and documents in connection with The Middle East Forum.

- ☐ MEF Docs 000462 through 000468: text thread between Delaney Yonchek and Marnie Meyer.
- ☐ MEF Docs 000871 through 000874: text thread between Delaney Yonchek, Patricia McNulty, and Caitriona Brady.
- ☐ MEF Docs 000875 through 000877: text thread between Delaney Yonchek, Patricia McNulty, Lisa Barbounis, and Caitriona Brady.
- ☐ MEF Docs 000878 through 000879: text thread between Delaney Yonchek, Caitriona Brady, and Lisa Barbounis.
- ☐ MEF Docs 000880 through 000888: text thread between Caitriona Brady, and Lisa Barbounis and Patricia McNulty.
- ☐ MEF Docs 000889 through 000889: partial transcript from purported telephone call between Matthew Ebert and Greg Roman.
- ☐ MEF Docs 000890 through 000890: Partial text thread between Lisa Barbounis and the MEF Network Administrator.
- ☐ MEF Docs 000891 through 000917: Information related to Declaration of Lisa Barbounis in connection with electronic devices.
- ☐ MEF Docs 000918 through 000919: Email communications.
- ☐ MEF Docs 000920 through 000953 Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000954 through 000961: Email communications.
- ☐ MEF Docs 000962 through 000965: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000966 through 000995: Email communications.
- ☐ MEF Docs 000996 through 000967: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000998 through 001002: Handwritten report.
- ☐ MEF Docs 001003 through 001012: Electronic Communications related to The Middle East Forum.
- ☐ MEF Docs 001013 through 001013: Absentee Request.
- ☐ MEF Docs 001014 through 001018: Documents related to Delaney Yonchek.
- ☐ MEF Docs 001015 through 001055 Electronic communications related to The Middle East Forum.
- ☐ LB Supplemental Production 00001 through 00190 The Middle East Forum tax returns for years 2004, 2015, 2016, and 2017 – related to punitive damages.
- ☐ LB Supplemental Production 00191 through 00191 Advertisement for AirBNB in Israel.

- ☐ LB Supplemental Production 00192 through 00198 Tiffany Lee Charge of Discrimination.
- ☐ LB Supplemental Production 00199 through 00200 Letter from Attison Barnes.
- ☐ LB Supplemental Production 00201 through 00201 Letter to Dave Walton.
- ☐ LB Supplemental Production 00202 through 00209 Letter from Dave Walton.
- ☐ LB Supplemental Production 00210 through 00210 Information related to MEF Response.
- ☐ LB Supplemental Production 00211 through 00215 Handwritten report.
- ☐ LB Supplemental Production 00216 through 00216 Notice of Charge.
- ☐ LB Supplemental Production 00208 through 00237 Emails and information produced by Lisa Barbounis including emails and Greg Roman LinkedIn Page.
- ☐ LB Supplemental Production 00238 through 00290 Emails and information produced by Lisa Barbounis including emails and insurance information for MEF.
- ☐ LB Supplemental Production 00291 through 00299 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00300 through 00304 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00305 through 00345 Electronic messages related to MEF and Daniel Pipes including text messages between Lisa Barbounis and Patricia McNulty sent in real time while Lisa Barbounis was in Israel with Greg Roman.
- ☐ Plaintiff has also produced recordings of Daniel Thomas and Tommy Robinson discussing Greg Roman's illegal offer of money for testimony.
- ☐ Plaintiff has also produced a recording of Alana Goodman describing Greg Roman's sexual harassment including exposing his penis in front of Ms. Goodman and trying to trade sex for stories – including threats.
- ☐ Plaintiff has also produced the comprehensive narrative report of Dr. Zakireh related to the claim of emotional distress made by Lisa Barbounis.
- ☐ Plaintiff has also produced several hundred thousand documents taken from Lisa Barbounis's electronic devices, social media accounts, emails accounts, and cloud based storage accounts. Plaintiff and Defendants received this production at the same time. Accordingly, all documents produced through are equally accessible to Defendants as Plaintiff.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

2. All documents relating to Plaintiff's employment with The Forum, including, but not limited to, resumes, employment applications, performance evaluations and/or improvement plans, commendations, explanations or promises of benefits, records of benefits, employee handbooks, rules and/or policies, job assignments, changes in job assignments, notification of salary increases, pay stubs or earnings summaries, complaints or communications to any other employees of The Forum.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.
- ☐ MEF Docs 000052 through 000073: text thread between Delaney Yonchek and Patricia McNulty (29 images were also produced that were part of this thread).
- ☐ MEF Docs 000074 through 000103: text thread between Delaney Yonchek, Patricia McNulty, and Lisa Barbounis.
- ☐ MEF Docs 000104 through 000226: text thread between Delaney Yonchek and Lisa Barbounis (146 images were produced that were part of this thread).
- ☐ MEF Docs 000227 through 000461: Articles and documents in connection with The Middle East Forum.
- ☐ MEF Docs 000462 through 000468: text thread between Delaney Yonchek and Marnie Meyer.
- ☐ MEF Docs 000871 through 000874: text thread between Delaney Yonchek, Patricia McNulty, and Caitriona Brady.
- ☐ MEF Docs 000875 through 000877: text thread between Delaney Yonchek, Patricia McNulty, Lisa Barbounis, and Caitriona Brady.
- ☐ MEF Docs 000878 through 000879: text thread between Delaney Yonchek, Caitriona Brady, and Lisa Barbounis.
- ☐ MEF Docs 000880 through 000888: text thread between Caitriona Brady, and Lisa Barbounis and Patricia McNulty.
- ☐ MEF Docs 000889 through 000889: partial transcript from purported telephone call between Matthew Ebert and Greg Roman.
- ☐ MEF Docs 000890 through 000890: Partial text thread between Lisa Barbounis and the MEF Network Administrator.



- ☐ MEF Docs 000891 through 000917: Information related to Declaration of Lisa Barbounis in connection with electronic devices.
- ☐ MEF Docs 000918 through 000919: Email communications.
- ☐ MEF Docs 000920 through 000953 Electronic communications related to The Middle East Forum.
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- ☐ LB Supplemental Production 00211 through 00215 Handwritten report.
- ☐ LB Supplemental Production 00216 through 00216 Notice of Charge.
- ☐ LB Supplemental Production 00208 through 00237 Emails and information produced by Lisa Barbounis including emails and Greg Roman LinkedIn Page.
- ☐ LB Supplemental Production 00238 through 00290 Emails and information produced by Lisa Barbounis including emails and insurance information for MEF.

- ☐ LB Supplemental Production 00291 through 00299 Electronic messages related to MEF and Daniel Pipes.
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- ☐ LB Supplemental Production 00305 through 00345 Electronic messages related to MEF and Daniel Pipes including text messages between Lisa Barbounis and Patricia McNulty sent in real time while Lisa Barbounis was in Israel with Greg Roman.
- ☐ Plaintiff has also produced recordings of Daniel Thomas and Tommy Robinson discussing Greg Roman's illegal offer of money for testimony.
- ☐ Plaintiff has also produced a recording of Alana Goodman describing Greg Roman's sexual harassment including exposing his penis in front of Ms. Goodman and trying to trade sex for stories – including threats.
- ☐ Plaintiff has also produced the comprehensive narrative report of Dr. Zakireh related to the claim of emotional distress made by Lisa Barbounis.
- ☐ Plaintiff has also produced several hundred thousand documents taken from Lisa Barbounis's electronic devices, social media accounts, emails accounts, and cloud based storage accounts. Plaintiff and Defendants received this production at the same time. Accordingly, all documents produced through are equally accessible to Defendants as Plaintiff.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

3. Any and all correspondence, memoranda, and notes to and from Plaintiff about any matter related to Plaintiff's employment with The Forum.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.
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- ☐ MEF Docs 000074 through 000103: text thread between Delaney Yonchek, Patricia McNulty, and Lisa Barbounis.

- ☐ MEF Docs 000104 through 000226: text thread between Delaney Yonchek and Lisa Barbounis (146 images were produced that were part of this thread).
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- ☐ MEF Docs 001014 through 001018: Documents related to Delaney Yonchek.
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- ☐ LB Supplemental Production 00001 through 00190 The Middle East Forum tax returns for years 2004, 2015, 2016, and 2017 – related to punitive damages.
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- ☐ Plaintiff has also produced the comprehensive narrative report of Dr. Zakireh related to the claim of emotional distress made by Lisa Barbounis.
- ☐ Plaintiff has also produced several hundred thousand documents taken from Lisa Barbounis's electronic devices, social media accounts, emails accounts, and cloud based storage accounts. Plaintiff and Defendants received this production at the same time. Accordingly, all documents produced through are equally accessible to Defendants as Plaintiff.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

4. Any and all correspondence, memoranda, and notes to and from Plaintiff about the facts alleged in Plaintiff's Amended Complaint in this action.

Response:

Plaintiff has identified the documents produced in response to Defendants First Request For Production of Documents. See Plaintiff's Response to Request Number 1, above. By way of further answer, Plaintiff is not in possession of any additional notes, correspondence, or memorandum in connection with the facts alleged in the Amended Complaint.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

5. All documents that Plaintiff maintained as personal records, notes, calendars (paper and/or electronic), and/or diaries regarding her employment with The Forum, her salary and/or benefits from The Forum, the facts alleged in Plaintiff's Amended Complaint, or any discussions relating thereto with any employees and/or agents of The Forum.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.
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- ☐ MEF Docs 000996 through 000967: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000998 through 001002: Handwritten report.
- ☐ MEF Docs 001003 through 001012: Electronic Communications related to The Middle East Forum.
- ☐ MEF Docs 001013 through 001013: Absentee Request.
- ☐ MEF Docs 001014 through 001018: Documents related to Delaney Yonchek.
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- ☐ Plaintiff has also produced recordings of Daniel Thomas and Tommy Robinson discussing Greg Roman's illegal offer of money for testimony.
- ☐ Plaintiff has also produced a recording of Alana Goodman describing Greg Roman's sexual harassment including exposing his penis in front of Ms. Goodman and trying to trade sex for stories – including threats.

Plaintiff is not in possession of any other documents responsive to this request. Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

6. All documents, including emails and other electronic communications, exchanged between you and any current or former employee or agent of The Forum from October 16, 2017 to present relating to any or all of the conduct alleged in the Amended Complaint. This request includes, but is not limited to, letters, notes, email messages, social media messages and postings, and text messages.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.



- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.
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- ☐ MEF Docs 000998 through 001002: Handwritten report.
- ☐ MEF Docs 001003 through 001012: Electronic Communications related to The Middle East Forum.
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- ☐ Plaintiff has also produced a recording of Alana Goodman describing Greg Roman's sexual harassment including exposing his penis in front of Ms. Goodman and trying to trade sex for stories – including threats.

Plaintiff is not in possession of any other documents responsive to this request. Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

7. All documents relating to and supporting the allegations of sexual misconduct occurring in Israel as alleged in Plaintiff's Amended Complaint, including but not limited to the allegations set forth in paragraphs 187-232 of the Amended Complaint. This request includes but is not limited to, letters, notes, email messages, social media messages and postings, and text messages.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
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- ☐ MEF Docs 000104 through 000226: text thread between Delaney Yonchek and Lisa Barbounis (146 images were produced that were part of this thread).
- ☐ MEF Docs 000227 through 000461: Articles and documents in connection with The Middle East Forum.
- ☐ MEF Docs 000462 through 000468: text thread between Delaney Yonchek and Marnie Meyer.
- ☐ MEF Docs 000871 through 000874: text thread between Delaney Yonchek, Patricia McNulty, and Caitriona Brady.
- ☐ MEF Docs 000875 through 000877: text thread between Delaney Yonchek, Patricia McNulty, Lisa Barbounis, and Caitriona Brady.
- ☐ MEF Docs 000878 through 000879: text thread between Delaney Yonchek, Caitriona Brady, and Lisa Barbounis.
- ☐ MEF Docs 000880 through 000888: text thread between Caitriona Brady, and Lisa Barbounis and Patricia McNulty.

- ☐ MEF Docs 000889 through 000889: partial transcript from purported telephone call between Matthew Ebert and Greg Roman.
- ☐ MEF Docs 000890 through 000890: Partial text thread between Lisa Barbounis and the MEF Network Administrator.
- ☐ MEF Docs 000891 through 000917: Information related to Declaration of Lisa Barbounis in connection with electronic devices.
- ☐ MEF Docs 000918 through 000919: Email communications.
- ☐ MEF Docs 000920 through 000953 Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000954 through 000961: Email communications.
- ☐ MEF Docs 000962 through 000965: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000966 through 000995: Email communications.
- ☐ MEF Docs 000996 through 000967: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000998 through 001002: Handwritten report.
- ☐ MEF Docs 001003 through 001012: Electronic Communications related to The Middle East Forum.
- ☐ MEF Docs 001013 through 001013: Absentee Request.
- ☐ MEF Docs 001014 through 001018: Documents related to Delaney Yonchek.
- ☐ MEF Docs 001015 through 001055 Electronic communications related to The Middle East Forum.
- ☐ LB Supplemental Production 00001 through 00190 The Middle East Forum tax returns for years 2004, 2015, 2016, and 2017 – related to punitive damages.
- ☐ LB Supplemental Production 00191 through 00191 Advertisement for AirBNB in Israel.
- ☐ LB Supplemental Production 00192 through 00198 Tiffany Lee Charge of Discrimination.
- ☐ LB Supplemental Production 00199 through 00200 Letter from Attison Barnes.
- ☐ LB Supplemental Production 00201 through 00201 Letter to Dave Walton.
- ☐ LB Supplemental Production 00202 through 00209 Letter from Dave Walton.
- ☐ LB Supplemental Production 00210 through 00210 Information related to MEF Response.
- ☐ LB Supplemental Production 00211 through 00215 Handwritten report.
- ☐ LB Supplemental Production 00216 through 00216 Notice of Charge.

- ☐ LB Supplemental Production 00208 through 00237 Emails and information produced by Lisa Barbounis including emails and Greg Roman LinkedIn Page.
- ☐ LB Supplemental Production 00238 through 00290 Emails and information produced by Lisa Barbounis including emails and insurance information for MEF.
- ☐ LB Supplemental Production 00291 through 00299 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00300 through 00304 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00305 through 00345 Electronic messages related to MEF and Daniel Pipes including text messages between Lisa Barbounis and Patricia McNulty sent in real time while Lisa Barbounis was in Israel with Greg Roman.
- ☐ Plaintiff has also produced recordings of Daniel Thomas and Tommy Robinson discussing Greg Roman's illegal offer of money for testimony.
- ☐ Plaintiff has also produced a recording of Alana Goodman describing Greg Roman's sexual harassment including exposing his penis in front of Ms. Goodman and trying to trade sex for stories – including threats.
- ☐ Plaintiff has also produced the comprehensive narrative report of Dr. Zakireh related to the claim of emotional distress made by Lisa Barbounis.
- ☐ Plaintiff has also produced several hundred thousand documents taken from Lisa Barbounis's electronic devices, social media accounts, emails accounts, and cloud based storage accounts. Plaintiff and Defendants received this production at the same time. Accordingly, all documents produced through are equally accessible to Defendants as Plaintiff.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

8. All documents relating to and supporting the allegations of sexual misconduct occurring in Washington D.C. as alleged in Plaintiff's Amended Complaint, including but not limited to the allegations set forth in paragraphs 34, 73, 74, 308, and 325 of the Amended Complaint. This request includes but is not limited to, letters, notes, email messages, social media messages and postings, and text messages.

Response:

See the recording produced in connection with a conversation between Lisa Barbounis and Alana Goodman. Plaintiff is not in possession of any other documents responsive to this request.

9. All documents relating to Plaintiff's effort to report the alleged incidents of sexual misconduct, hostile work environment, discrimination, and/or harassment based on your gender to MEF as alleged in Plaintiff's Amended Complaint, including but not limited to the allegations set forth in paragraphs 38, 296, 297, 307-310, 326 of the Amended Complaint.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.
- ☐ MEF Docs 000052 through 000073: text thread between Delaney Yonchek and Patricia McNulty (29 images were also produced that were part of this thread).
- ☐ MEF Docs 000074 through 000103: text thread between Delaney Yonchek, Patricia McNulty, and Lisa Barbounis.
- ☐ MEF Docs 000104 through 000226: text thread between Delaney Yonchek and Lisa Barbounis (146 images were produced that were part of this thread).
- ☐ MEF Docs 000227 through 000461: Articles and documents in connection with The Middle East Forum.
- ☐ MEF Docs 000462 through 000468: text thread between Delaney Yonchek and Marnie Meyer.
- ☐ MEF Docs 000871 through 000874: text thread between Delaney Yonchek, Patricia McNulty, and Caitriona Brady.
- ☐ MEF Docs 000875 through 000877: text thread between Delaney Yonchek, Patricia McNulty, Lisa Barbounis, and Caitriona Brady.
- ☐ MEF Docs 000878 through 000879: text thread between Delaney Yonchek, Caitriona Brady, and Lisa Barbounis.
- ☐ MEF Docs 000880 through 000888: text thread between Caitriona Brady, and Lisa Barbounis and Patricia McNulty.
- ☐ MEF Docs 000889 through 000889: partial transcript from purported telephone call between Matthew Ebert and Greg Roman.
- ☐ MEF Docs 000890 through 000890: Partial text thread between Lisa Barbounis and the MEF Network Administrator.
- ☐ MEF Docs 000891 through 000917: Information related to Declaration of Lisa Barbounis in connection with electronic devices.

- ☐ MEF Docs 000918 through 000919: Email communications.
- ☐ MEF Docs 000920 through 000953 Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000954 through 000961: Email communications.
- ☐ MEF Docs 000962 through 000965: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000966 through 000995: Email communications.
- ☐ MEF Docs 000996 through 000967: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000998 through 001002: Handwritten report.
- ☐ MEF Docs 001003 through 001012: Electronic Communications related to The Middle East Forum.
- ☐ MEF Docs 001013 through 001013: Absentee Request.
- ☐ MEF Docs 001014 through 001018: Documents related to Delaney Yonchek.
- ☐ MEF Docs 001015 through 001055 Electronic communications related to The Middle East Forum.
- ☐ LB Supplemental Production 00001 through 00190 The Middle East Forum tax returns for years 2004, 2015, 2016, and 2017 – related to punitive damages.
- ☐ LB Supplemental Production 00191 through 00191 Advertisement for AirBNB in Israel.
- ☐ LB Supplemental Production 00192 through 00198 Tiffany Lee Charge of Discrimination.
- ☐ LB Supplemental Production 00199 through 00200 Letter from Attison Barnes.
- ☐ LB Supplemental Production 00201 through 00201 Letter to Dave Walton.
- ☐ LB Supplemental Production 00202 through 00209 Letter from Dave Walton.
- ☐ LB Supplemental Production 00210 through 00210 Information related to MEF Response.
- ☐ LB Supplemental Production 00211 through 00215 Handwritten report.
- ☐ LB Supplemental Production 00216 through 00216 Notice of Charge.
- ☐ LB Supplemental Production 00208 through 00237 Emails and information produced by Lisa Barbounis including emails and Greg Roman LinkedIn Page.
- ☐ LB Supplemental Production 00238 through 00290 Emails and information produced by Lisa Barbounis including emails and insurance information for MEF.
- ☐ LB Supplemental Production 00291 through 00299 Electronic messages related to MEF and Daniel Pipes.

- ☐ LB Supplemental Production 00300 through 00304 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00305 through 00345 Electronic messages related to MEF and Daniel Pipes including text messages between Lisa Barbounis and Patricia McNulty sent in real time while Lisa Barbounis was in Israel with Greg Roman.
- ☐ Plaintiff has also produced recordings of Daniel Thomas and Tommy Robinson discussing Greg Roman's illegal offer of money for testimony.
- ☐ Plaintiff has also produced a recording of Alana Goodman describing Greg Roman's sexual harassment including exposing his penis in front of Ms. Goodman and trying to trade sex for stories – including threats.
- ☐ Plaintiff has also produced the comprehensive narrative report of Dr. Zakireh related to the claim of emotional distress made by Lisa Barbounis.
- ☐ Plaintiff has also produced several hundred thousand documents taken from Lisa Barbounis's electronic devices, social media accounts, emails accounts, and cloud based storage accounts. Plaintiff and Defendants received this production at the same time. Accordingly, all documents produced through are equally accessible to Defendants as Plaintiff.

By way of further answer, Plaintiff made many of the reports as alleged in the complaint verbally as Defendants did not maintain an antidiscrimination policy and the harassment was a proxy for the organization and Plaintiff feared retaliation and that written reports would be futile. Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

10. All documents relating to the alleged ongoing campaign of discrimination, hostile work environment, harassment and/ or retaliation as alleged in Plaintiff's Amended Complaint, including but not limited to the allegations set forth in paragraphs 19, 20, 22, 23, 27, 30, 31, 34, 75, 81-84, 196, 216, 223, 245, 252, 260, 283, 358, 360-364, 382-383, 390, 399, and 414 of the Amended Complaint.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.
- ☐ MEF Docs 000052 through 000073: text thread between Delaney Yonchek and Patricia McNulty (29 images were also produced that were part of this thread).

- ☐ MEF Docs 000074 through 000103: text thread between Delaney Yonchek, Patricia McNulty, and Lisa Barbounis.
- ☐ MEF Docs 000104 through 000226: text thread between Delaney Yonchek and Lisa Barbounis (146 images were produced that were part of this thread).
- ☐ MEF Docs 000227 through 000461: Articles and documents in connection with The Middle East Forum.
- ☐ MEF Docs 000462 through 000468: text thread between Delaney Yonchek and Marnie Meyer.
- ☐ MEF Docs 000871 through 000874: text thread between Delaney Yonchek, Patricia McNulty, and Caitriona Brady.
- ☐ MEF Docs 000875 through 000877: text thread between Delaney Yonchek, Patricia McNulty, Lisa Barbounis, and Caitriona Brady.
- ☐ MEF Docs 000878 through 000879: text thread between Delaney Yonchek, Caitriona Brady, and Lisa Barbounis.
- ☐ MEF Docs 000880 through 000888: text thread between Caitriona Brady, and Lisa Barbounis and Patricia McNulty.
- ☐ MEF Docs 000889 through 000889: partial transcript from purported telephone call between Matthew Ebert and Greg Roman.
- ☐ MEF Docs 000890 through 000890: Partial text thread between Lisa Barbounis and the MEF Network Administrator.
- ☐ MEF Docs 000891 through 000917: Information related to Declaration of Lisa Barbounis in connection with electronic devices.
- ☐ MEF Docs 000918 through 000919: Email communications.
- ☐ MEF Docs 000920 through 000953 Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000954 through 000961: Email communications.
- ☐ MEF Docs 000962 through 000965: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000966 through 000995: Email communications.
- ☐ MEF Docs 000996 through 000967: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000998 through 001002: Handwritten report.
- ☐ MEF Docs 001003 through 001012: Electronic Communications related to The Middle East Forum.
- ☐ MEF Docs 001013 through 001013: Absentee Request.
- ☐ MEF Docs 001014 through 001018: Documents related to Delaney Yonchek.



- ☐ MEF Docs 001015 through 001055 Electronic communications related to The Middle East Forum.
- ☐ LB Supplemental Production 00001 through 00190 The Middle East Forum tax returns for years 2004, 2015, 2016, and 2017 – related to punitive damages.
- ☐ LB Supplemental Production 00191 through 00191 Advertisement for AirBNB in Israel.
- ☐ LB Supplemental Production 00192 through 00198 Tiffany Lee Charge of Discrimination.
- ☐ LB Supplemental Production 00199 through 00200 Letter from Attison Barnes.
- ☐ LB Supplemental Production 00201 through 00201 Letter to Dave Walton.
- ☐ LB Supplemental Production 00202 through 00209 Letter from Dave Walton.
- ☐ LB Supplemental Production 00210 through 00210 Information related to MEF Response.
- ☐ LB Supplemental Production 00211 through 00215 Handwritten report.
- ☐ LB Supplemental Production 00216 through 00216 Notice of Charge.
- ☐ LB Supplemental Production 00208 through 00237 Emails and information produced by Lisa Barbounis including emails and Greg Roman LinkedIn Page.
- ☐ LB Supplemental Production 00238 through 00290 Emails and information produced by Lisa Barbounis including emails and insurance information for MEF.
- ☐ LB Supplemental Production 00291 through 00299 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00300 through 00304 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00305 through 00345 Electronic messages related to MEF and Daniel Pipes including text messages between Lisa Barbounis and Patricia McNulty sent in real time while Lisa Barbounis was in Israel with Greg Roman.
- ☐ Plaintiff has also produced recordings of Daniel Thomas and Tommy Robinson discussing Greg Roman's illegal offer of money for testimony.
- ☐ Plaintiff has also produced a recording of Alana Goodman describing Greg Roman's sexual harassment including exposing his penis in front of Ms. Goodman and trying to trade sex for stories – including threats.
- ☐ Plaintiff has also produced the comprehensive narrative report of Dr. Zakireh related to the claim of emotional distress made by Lisa Barbounis.
- ☐ Plaintiff has also produced several hundred thousand documents taken from Lisa Barbounis's electronic devices, social media accounts, emails accounts, and cloud based storage accounts. Plaintiff and Defendants received this production at the same time. Accordingly, all documents produced through are equally accessible to Defendants as Plaintiff.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

11. All documents relating to your contention that Pipes permitted and condoned Roman's discrimination and harassment of you as alleged in Plaintiff's Amended Complaint, including but not limited to paragraphs 329-339.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.
- ☐ MEF Docs 000052 through 000073: text thread between Delaney Yonchek and Patricia McNulty (29 images were also produced that were part of this thread).
- ☐ MEF Docs 000074 through 000103: text thread between Delaney Yonchek, Patricia McNulty, and Lisa Barbounis.
- ☐ MEF Docs 000104 through 000226: text thread between Delaney Yonchek and Lisa Barbounis (146 images were produced that were part of this thread).
- ☐ MEF Docs 000227 through 000461: Articles and documents in connection with The Middle East Forum.
- ☐ MEF Docs 000462 through 000468: text thread between Delaney Yonchek and Marnie Meyer.
- ☐ MEF Docs 000871 through 000874: text thread between Delaney Yonchek, Patricia McNulty, and Caitriona Brady.
- ☐ MEF Docs 000875 through 000877: text thread between Delaney Yonchek, Patricia McNulty, Lisa Barbounis, and Caitriona Brady.
- ☐ MEF Docs 000878 through 000879: text thread between Delaney Yonchek, Caitriona Brady, and Lisa Barbounis.
- ☐ MEF Docs 000880 through 000888: text thread between Caitriona Brady, and Lisa Barbounis and Patricia McNulty.
- ☐ MEF Docs 000889 through 000889: partial transcript from purported telephone call between Matthew Ebert and Greg Roman.

- ☐ MEF Docs 000890 through 000890: Partial text thread between Lisa Barbounis and the MEF Network Administrator.
- ☐ MEF Docs 000891 through 000917: Information related to Declaration of Lisa Barbounis in connection with electronic devices.
- ☐ MEF Docs 000918 through 000919: Email communications.
- ☐ MEF Docs 000920 through 000953 Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000954 through 000961: Email communications.
- ☐ MEF Docs 000962 through 000965: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000966 through 000995: Email communications.
- ☐ MEF Docs 000996 through 000967: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000998 through 001002: Handwritten report.
- ☐ MEF Docs 001003 through 001012: Electronic Communications related to The Middle East Forum.
- ☐ MEF Docs 001013 through 001013: Absentee Request.
- ☐ MEF Docs 001014 through 001018: Documents related to Delaney Yonchek.
- ☐ MEF Docs 001015 through 001055 Electronic communications related to The Middle East Forum.
- ☐ LB Supplemental Production 00001 through 00190 The Middle East Forum tax returns for years 2004, 2015, 2016, and 2017 – related to punitive damages.
- ☐ LB Supplemental Production 00191 through 00191 Advertisement for AirBNB in Israel.
- ☐ LB Supplemental Production 00192 through 00198 Tiffany Lee Charge of Discrimination.
- ☐ LB Supplemental Production 00199 through 00200 Letter from Attison Barnes.
- ☐ LB Supplemental Production 00201 through 00201 Letter to Dave Walton.
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- ☐ LB Supplemental Production 00210 through 00210 Information related to MEF Response.
- ☐ LB Supplemental Production 00211 through 00215 Handwritten report.
- ☐ LB Supplemental Production 00216 through 00216 Notice of Charge.
- ☐ LB Supplemental Production 00208 through 00237 Emails and information produced by Lisa Barbounis including emails and Greg Roman LinkedIn Page.

- ☐ LB Supplemental Production 00238 through 00290 Emails and information produced by Lisa Barbounis including emails and insurance information for MEF.
- ☐ LB Supplemental Production 00291 through 00299 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00300 through 00304 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00305 through 00345 Electronic messages related to MEF and Daniel Pipes including text messages between Lisa Barbounis and Patricia McNulty sent in real time while Lisa Barbounis was in Israel with Greg Roman.
- ☐ Plaintiff has also produced recordings of Daniel Thomas and Tommy Robinson discussing Greg Roman's illegal offer of money for testimony.
- ☐ Plaintiff has also produced a recording of Alana Goodman describing Greg Roman's sexual harassment including exposing his penis in front of Ms. Goodman and trying to trade sex for stories – including threats.
- ☐ Plaintiff has also produced the comprehensive narrative report of Dr. Zakireh related to the claim of emotional distress made by Lisa Barbounis.
- ☐ Plaintiff has also produced several hundred thousand documents taken from Lisa Barbounis's electronic devices, social media accounts, emails accounts, and cloud based storage accounts. Plaintiff and Defendants received this production at the same time. Accordingly, all documents produced through are equally accessible to Defendants as Plaintiff.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

12. All documents relating to the damages or other relief you are seeking in this action.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.
- ☐ MEF Docs 000052 through 000073: text thread between Delaney Yonchek and Patricia McNulty (29 images were also produced that were part of this thread).

- ☐ MEF Docs 000074 through 000103: text thread between Delaney Yonchek, Patricia McNulty, and Lisa Barbounis.
- ☐ MEF Docs 000104 through 000226: text thread between Delaney Yonchek and Lisa Barbounis (146 images were produced that were part of this thread).
- ☐ MEF Docs 000227 through 000461: Articles and documents in connection with The Middle East Forum.
- ☐ MEF Docs 000462 through 000468: text thread between Delaney Yonchek and Marnie Meyer.
- ☐ MEF Docs 000871 through 000874: text thread between Delaney Yonchek, Patricia McNulty, and Caitriona Brady.
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- ☐ MEF Docs 000880 through 000888: text thread between Caitriona Brady, and Lisa Barbounis and Patricia McNulty.
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- ☐ MEF Docs 000890 through 000890: Partial text thread between Lisa Barbounis and the MEF Network Administrator.
- ☐ MEF Docs 000891 through 000917: Information related to Declaration of Lisa Barbounis in connection with electronic devices.
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- ☐ MEF Docs 000920 through 000953 Electronic communications related to The Middle East Forum.
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- ☐ MEF Docs 000962 through 000965: Electronic communications related to The Middle East Forum.
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- ☐ MEF Docs 000996 through 000967: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000998 through 001002: Handwritten report.
- ☐ MEF Docs 001003 through 001012: Electronic Communications related to The Middle East Forum.
- ☐ MEF Docs 001013 through 001013: Absentee Request.
- ☐ MEF Docs 001014 through 001018: Documents related to Delaney Yonchek.

- ☐ MEF Docs 001015 through 001055 Electronic communications related to The Middle East Forum.
- ☐ LB Supplemental Production 00001 through 00190 The Middle East Forum tax returns for years 2004, 2015, 2016, and 2017 – related to punitive damages.
- ☐ LB Supplemental Production 00191 through 00191 Advertisement for AirBNB in Israel.
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- ☐ Plaintiff has also produced a recording of Alana Goodman describing Greg Roman's sexual harassment including exposing his penis in front of Ms. Goodman and trying to trade sex for stories – including threats.
- ☐ Plaintiff has also produced the comprehensive narrative report of Dr. Zakireh related to the claim of emotional distress made by Lisa Barbounis.
- ☐ Plaintiff has also produced several hundred thousand documents taken from Lisa Barbounis's electronic devices, social media accounts, emails accounts, and cloud based storage accounts. Plaintiff and Defendants received this production at the same time. Accordingly, all documents produced through are equally accessible to Defendants as Plaintiff.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

13. All documents relating to your alleged emotional distress.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.
- ☐ MEF Docs 000052 through 000073: text thread between Delaney Yonchek and Patricia McNulty (29 images were also produced that were part of this thread).
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- ☐ MEF Docs 000871 through 000874: text thread between Delaney Yonchek, Patricia McNulty, and Caitriona Brady.
- ☐ MEF Docs 000875 through 000877: text thread between Delaney Yonchek, Patricia McNulty, Lisa Barbounis, and Caitriona Brady.
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- ☐ MEF Docs 000880 through 000888: text thread between Caitriona Brady, and Lisa Barbounis and Patricia McNulty.
- ☐ MEF Docs 000889 through 000889: partial transcript from purported telephone call between Matthew Ebert and Greg Roman.
- ☐ MEF Docs 000890 through 000890: Partial text thread between Lisa Barbounis and the MEF Network Administrator.

- ☐ MEF Docs 000891 through 000917: Information related to Declaration of Lisa Barbounis in connection with electronic devices.
- ☐ MEF Docs 000918 through 000919: Email communications.
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- ☐ LB Supplemental Production 00238 through 00290 Emails and information produced by Lisa Barbounis including emails and insurance information for MEF.



- ☐ LB Supplemental Production 00291 through 00299 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00300 through 00304 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00305 through 00345 Electronic messages related to MEF and Daniel Pipes including text messages between Lisa Barbounis and Patricia McNulty sent in real time while Lisa Barbounis was in Israel with Greg Roman.
- ☐ Plaintiff has also produced recordings of Daniel Thomas and Tommy Robinson discussing Greg Roman's illegal offer of money for testimony.
- ☐ Plaintiff has also produced a recording of Alana Goodman describing Greg Roman's sexual harassment including exposing his penis in front of Ms. Goodman and trying to trade sex for stories – including threats.
- ☐ Plaintiff has also produced the comprehensive narrative report of Dr. Zakireh related to the claim of emotional distress made by Lisa Barbounis.
- ☐ Plaintiff has also produced several hundred thousand documents taken from Lisa Barbounis's electronic devices, social media accounts, emails accounts, and cloud based storage accounts. Plaintiff and Defendants received this production at the same time. Accordingly, all documents produced through are equally accessible to Defendants as Plaintiff.

By way of further answer, see Plaintiff's Confidential Medical Records Bates Stamped 0001 through 0252 which are medical records reviewed by Dr. Zakireh in connection with Plaintiff's claim for emotional distress.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

14. All statements or affidavits by individuals relating to or supporting the allegations you have made in this action, including any statements made by Defendants, their agents, or employees.

Response:

Plaintiff has produced all documents related to this Request but reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order. Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

15. All documents relating to your application for or receipt of any disability benefits (including but not limited to social security disability benefits), worker's compensation benefits, and/or unemployment compensation benefits.

Response:

Plaintiff is not in receipt of benefits in connection with this Request. Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

16. All documents relating to any employment you have had, including self-employment, including but not limited to, documents relating to any offer of employment; job title; job status; rate of pay; benefits; change in job title, status, or rate of pay; termination of employment, if any; descriptions of jobs held and work performed; employee handbooks; and employee benefits.

Response:

Plaintiff moved directly from The Middle East Forum to a position working for Congressman Randy Weber. Plaintiff objects to providing employment records in connection with Congressman Randy Weber as Plaintiff earns more money today than she earned during her employment with The Middle East Forum. Accordingly, the employment records from future employment are not relevant and the request is not proportional to the needs of this litigation. Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

17. Copies of your bank records, checks or cancelled checks, and/or deposit statements for any transaction relating to your receipt of any funds from The Forum, including, but not limited to, salary and severance payments, from October 16, 2017 to present.

Response:

Plaintiff is not in possession of any documents related to this Request. The only money Plaintiff received from The Middle East Forum was paid through Plaintiff's w2 paycheck. Any documents related to Plaintiff's salaries/wages are already in the possession of the Defendants and are more accessible to Defendants than Plaintiff. Accordingly this request is overly broad, unduly burdensome and not proportional to the needs of this litigation. Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

18. Copies of all portions of your income tax returns relating to any source of income, including W2 forms and all other attachments relating to income or remuneration, for each of the past three (3) years through the date of the trial of this lawsuit.

Response:

Plaintiff is not in possession of any documents related to this Request. The only money Plaintiff received from The Middle East Forum was paid through Plaintiff's w2 paycheck. Any documents related to Plaintiff's salaries/wages are already in the possession of the Defendants and are more accessible to Defendants than Plaintiff. Accordingly this request is overly broad, unduly burdensome and not proportional to the needs of this litigation.

Moreover, Plaintiff moved directly from The Middle East Forum to a position working for Congressman Randy Weber. Plaintiff objects to providing employment records in connection with Congressman Randy Weber as Plaintiff earns more money today than she earned during her employment with The Middle East Forum. Accordingly, the employment records from future employment are not relevant and the request is not proportional to the needs of this litigation.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

19. All documents relating to your efforts, if any, to find a potential job while you were still employed by MEF including job applications, resumes, cover letters, and want ads.

Response:

See Plaintiff's production of documents identified above. Plaintiff has produced documents connected to her job search in documents Bates Stamped MEF Docs 001015 through 001055 Electronic communications related to The Middle East Forum; and LB Supplemental Production 00305 through 00345 Electronic messages related to MEF and Daniel Pipes including text

messages between Lisa Barbounis and Patricia McNulty sent in real time while Lisa Barbounis was in Israel with Greg Roman.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

20. All documents including job applications, resumes and cover letters you provided to any potential employer, headhunter or employment agency since your employment with The Forum ended.

Response:

See Plaintiff's production of documents identified above. Plaintiff has produced documents connected to her job search in documents Bates Stamped MEF Docs 001015 through 001055 Electronic communications related to The Middle East Forum; and LB Supplemental Production 00305 through 00345 Electronic messages related to MEF and Daniel Pipes including text messages between Lisa Barbounis and Patricia McNulty sent in real time while Lisa Barbounis was in Israel with Greg Roman.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

21. Copies of application forms, business cards, post cards, letters or documents you received from any potential employer, headhunter or employment agency since your employment with The Forum ended.

Response:

Plaintiff is not in possession of any documents related to this Request. Plaintiff objects to providing Defendants with documents related to Congressman Randy Weber, as Plaintiff's employment with Congressman Weber does not require Plaintiff to produce to Defendants, Plaintiff's business cards or other cards. Accordingly this request is overly broad, unduly burdensome and not proportional to the needs of this litigation.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

22. All correspondences, written communications, and any other documents that you received from any person or entity to whom you have applied for employment since October 16, 2017.

Response:

Plaintiff moved directly from The Middle East Forum to a position working for Congressman Randy Weber. Plaintiff objects to providing employment records in connection with Congressman Randy Weber as Plaintiff earns more money today than she earned during her employment with The Middle East Forum. Accordingly, the employment records from future employment are not relevant and the request is not proportional to the needs of this litigation.

Plaintiff objects to providing Defendants with documents related to Congressman Randy Weber, as Plaintiff's employment with Congressman Weber does not require Plaintiff to produce to Defendants, document related to her current employment. Accordingly this request is overly broad, unduly burdensome and not proportional to the needs of this litigation.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

23. All correspondences, written communications, or documents offering you employment that you have received from any person or entity since October 16, 2017.

Response:

Plaintiff moved directly from The Middle East Forum to a position working for Congressman Randy Weber. Plaintiff objects to providing employment records in connection with Congressman Randy Weber as Plaintiff earns more money today than she earned during her employment with The Middle East Forum. Accordingly, the employment records from future employment are not relevant and the request is not proportional to the needs of this litigation.

Plaintiff objects to providing Defendants with documents related to Congressman Randy Weber, as Plaintiff's employment with Congressman Weber does not require Plaintiff to produce to Defendants, document related to her current employment. Accordingly this request is overly broad, unduly burdensome and not proportional to the needs of this litigation.

Plaintiff is not in possession of any other documents subject to this Request. The only employment where Plaintiff worked since October 2017 is with Congressman Weber and The Middle East Forum.

24. All pay stubs from current and former employers for the last three (3) years.

Response:

Plaintiff moved directly from The Middle East Forum to a position working for Congressman Randy Weber. Plaintiff objects to providing employment records in connection with Congressman Randy Weber as Plaintiff earns more money today than she earned during her employment with The Middle East Forum. Accordingly, the employment records from future employment are not relevant and the request is not proportional to the needs of this litigation.

Plaintiff objects to providing Defendants with documents related to Congressman Randy Weber, as Plaintiff's employment with Congressman Weber does not require Plaintiff to produce to Defendants, document related to her current employment. Accordingly this request is overly broad, unduly burdensome and not proportional to the needs of this litigation.

The only money Plaintiff received from The Middle East Forum was paid through Plaintiff's w2 paycheck. Any documents related to Plaintiff's salaries/wages are already in the possession of the Defendants and are more accessible to Defendants than Plaintiff. Accordingly this request is overly broad, unduly burdensome and not proportional to the needs of this litigation.

Plaintiff is not in possession of any other documents subject to this Request. The only employment where Plaintiff worked since October 2017 is with Congressman Weber and The Middle East Forum.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

25. Copies of any and all hospital bills, bills from any medical facility, doctor bills, health care bills, bills from any medical professional, prescription charges, reports, or other documents indicating expenses incurred as a result of the end of your employment with The Forum, and/or as a result of all alleged injuries for which you seek recovery in this lawsuit.

Response:

See Plaintiff's Production of Confidential Medical Records Bates Stamped 0001 through 00252.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

26. Copies of any and all invoices, bills, documents or written charges documenting your alleged losses, including medical services and treatment in hospitals and services provided by doctors, chiropractors, or any medical professional related to any alleged injuries or damages in this lawsuit.

Response:

See Plaintiff's Production of Confidential Medical Records Bates Stamped 0001 through 00252.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

27. All documents that were generated or created by any doctor or medical professional including, but not limited to all doctors' reports, treatment records, prescriptions, intake questionnaires, charts, x-rays, medical histories, test results, notes, diagnoses, or any other medical documents regarding your physical or mental condition that in any way relate to any injuries or damages for which you are seeking recovery in this lawsuit.

Response:

See Plaintiff's Production of Confidential Medical Records Bates Stamped 0001 through 00252.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

28. All documents concerning prescriptions that you claim you need as a result of the ending of your employment with The Forum.

Response:

See Plaintiff's Production of Confidential Medical Records Bates Stamped 0001 through 00252.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

29. Please produce a completed, signed, and notarized original of the Authorization for Release of Medical Records attached to this Request for Production.

Response:

Plaintiff will execute an authorization for any medical treatment subject to this case but objects to executing a blanket authorization for any and all medical records that are not relevant to this action.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

30. All documents sent to or received from the Equal Employment Opportunity Commission, the Pennsylvania Human Relations Act, and/or any other federal, state, or local fair employment practices commission or agency, in which you claimed that an employer wrongfully discharged, discriminated against, harassed, and/or mistreated you.

Response:

See Documents Bates Stamped LB EEOC Docs 0001 through 0031.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

31. All letters, statements or other documents that you provided to any newspaper, radio television, media entity, or person affiliated with a media entity, regarding your employment with The Forum.

Response:

Plaintiff is not in possession of any documents subject to this Request.

32. All photographs and/or video tapes, tape recordings, real evidence, objects or things depicting any of the allegations in the Amended Complaint.

Response:

Plaintiff has produced all recordings subject to this Request. Plaintiff has sent Defendants the recordings of Tommy Robinson and Daniel Thomas talking about Greg Roman's offer to pay for



testimony. Plaintiff has produced the recording of Alana Goodman describing Greg Roman's sexual misconduct.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

33. Any and all contracts, retainer agreements or fee agreements for the payment of attorney's fees and litigation costs between you and your attorneys for your attorney's representation of you in this lawsuit.

Response:

34. Any and all entries, timesheets, computer printouts, invoices or bills generated by your attorneys regarding this lawsuit.

Response:

Plaintiff objects to this Request as it would violate privilege and the attorney work product doctrine.

35. All statements under oath provided by Plaintiff in any legal proceeding.

Response:

Plaintiff is not in possession of any documents subject to this Request.

36. All documents relating to Plaintiff's claims for compensatory and punitive damages.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.

- ☐ MEF Docs 000052 through 000073: text thread between Delaney Yonchek and Patricia McNulty (29 images were also produced that were part of this thread).
- ☐ MEF Docs 000074 through 000103: text thread between Delaney Yonchek, Patricia McNulty, and Lisa Barbounis.
- ☐ MEF Docs 000104 through 000226: text thread between Delaney Yonchek and Lisa Barbounis (146 images were produced that were part of this thread).
- ☐ MEF Docs 000227 through 000461: Articles and documents in connection with The Middle East Forum.
- ☐ MEF Docs 000462 through 000468: text thread between Delaney Yonchek and Marnie Meyer.
- ☐ MEF Docs 000871 through 000874: text thread between Delaney Yonchek, Patricia McNulty, and Caitriona Brady.
- ☐ MEF Docs 000875 through 000877: text thread between Delaney Yonchek, Patricia McNulty, Lisa Barbounis, and Caitriona Brady.
- ☐ MEF Docs 000878 through 000879: text thread between Delaney Yonchek, Caitriona Brady, and Lisa Barbounis.
- ☐ MEF Docs 000880 through 000888: text thread between Caitriona Brady, and Lisa Barbounis and Patricia McNulty.
- ☐ MEF Docs 000889 through 000889: partial transcript from purported telephone call between Matthew Ebert and Greg Roman.
- ☐ MEF Docs 000890 through 000890: Partial text thread between Lisa Barbounis and the MEF Network Administrator.
- ☐ MEF Docs 000891 through 000917: Information related to Declaration of Lisa Barbounis in connection with electronic devices.
- ☐ MEF Docs 000918 through 000919: Email communications.
- ☐ MEF Docs 000920 through 000953 Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000954 through 000961: Email communications.
- ☐ MEF Docs 000962 through 000965: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000966 through 000995: Email communications.
- ☐ MEF Docs 000996 through 000967: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000998 through 001002: Handwritten report.
- ☐ MEF Docs 001003 through 001012: Electronic Communications related to The Middle East Forum.

- ☐ MEF Docs 001013 through 001013: Absentee Request.
- ☐ MEF Docs 001014 through 001018: Documents related to Delaney Yonchek.
- ☐ MEF Docs 001015 through 001055 Electronic communications related to The Middle East Forum.
- ☐ LB Supplemental Production 00001 through 00190 The Middle East Forum tax returns for years 2004, 2015, 2016, and 2017 – related to punitive damages.
- ☐ LB Supplemental Production 00191 through 00191 Advertisement for AirBNB in Israel.
- ☐ LB Supplemental Production 00192 through 00198 Tiffany Lee Charge of Discrimination.
- ☐ LB Supplemental Production 00199 through 00200 Letter from Attison Barnes.
- ☐ LB Supplemental Production 00201 through 00201 Letter to Dave Walton.
- ☐ LB Supplemental Production 00202 through 00209 Letter from Dave Walton.
- ☐ LB Supplemental Production 00210 through 00210 Information related to MEF Response.
- ☐ LB Supplemental Production 00211 through 00215 Handwritten report.
- ☐ LB Supplemental Production 00216 through 00216 Notice of Charge.
- ☐ LB Supplemental Production 00208 through 00237 Emails and information produced by Lisa Barbounis including emails and Greg Roman LinkedIn Page.
- ☐ LB Supplemental Production 00238 through 00290 Emails and information produced by Lisa Barbounis including emails and insurance information for MEF.
- ☐ LB Supplemental Production 00291 through 00299 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00300 through 00304 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00305 through 00345 Electronic messages related to MEF and Daniel Pipes including text messages between Lisa Barbounis and Patricia McNulty sent in real time while Lisa Barbounis was in Israel with Greg Roman.
- ☐ Plaintiff has also produced recordings of Daniel Thomas and Tommy Robinson discussing Greg Roman's illegal offer of money for testimony.
- ☐ Plaintiff has also produced a recording of Alana Goodman describing Greg Roman's sexual harassment including exposing his penis in front of Ms. Goodman and trying to trade sex for stories – including threats.
- ☐ Plaintiff has also produced the comprehensive narrative report of Dr. Zakireh related to the claim of emotional distress made by Lisa Barbounis.
- ☐ Plaintiff has also produced several hundred thousand documents taken from Lisa Barbounis's electronic devices, social media accounts, emails accounts, and cloud based

storage accounts. Plaintiff and Defendants received this production at the same time. Accordingly, all documents produced through are equally accessible to Defendants as Plaintiff.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

Plaintiff also identifies all documents produced by Defendants and all medical records and expert reports.

37. Copies of all pictures concerning the allegations made in the Amended Complaint.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.
- ☐ MEF Docs 000052 through 000073: text thread between Delaney Yonchek and Patricia McNulty (29 images were also produced that were part of this thread).
- ☐ MEF Docs 000074 through 000103: text thread between Delaney Yonchek, Patricia McNulty, and Lisa Barbounis.
- ☐ MEF Docs 000104 through 000226: text thread between Delaney Yonchek and Lisa Barbounis (146 images were produced that were part of this thread).
- ☐ MEF Docs 000227 through 000461: Articles and documents in connection with The Middle East Forum.
- ☐ MEF Docs 000462 through 000468: text thread between Delaney Yonchek and Marnie Meyer.
- ☐ MEF Docs 000871 through 000874: text thread between Delaney Yonchek, Patricia McNulty, and Caitriona Brady.
- ☐ MEF Docs 000875 through 000877: text thread between Delaney Yonchek, Patricia McNulty, Lisa Barbounis, and Caitriona Brady.
- ☐ MEF Docs 000878 through 000879: text thread between Delaney Yonchek, Caitriona Brady, and Lisa Barbounis.
- ☐ MEF Docs 000880 through 000888: text thread between Caitriona Brady, and Lisa Barbounis and Patricia McNulty.

- ☐ MEF Docs 000889 through 000889: partial transcript from purported telephone call between Matthew Ebert and Greg Roman.
- ☐ MEF Docs 000890 through 000890: Partial text thread between Lisa Barbounis and the MEF Network Administrator.
- ☐ MEF Docs 000891 through 000917: Information related to Declaration of Lisa Barbounis in connection with electronic devices.
- ☐ MEF Docs 000918 through 000919: Email communications.
- ☐ MEF Docs 000920 through 000953 Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000954 through 000961: Email communications.
- ☐ MEF Docs 000962 through 000965: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000966 through 000995: Email communications.
- ☐ MEF Docs 000996 through 000967: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000998 through 001002: Handwritten report.
- ☐ MEF Docs 001003 through 001012: Electronic Communications related to The Middle East Forum.
- ☐ MEF Docs 001013 through 001013: Absentee Request.
- ☐ MEF Docs 001014 through 001018: Documents related to Delaney Yonchek.
- ☐ MEF Docs 001015 through 001055 Electronic communications related to The Middle East Forum.
- ☐ LB Supplemental Production 00001 through 00190 The Middle East Forum tax returns for years 2004, 2015, 2016, and 2017 – related to punitive damages.
- ☐ LB Supplemental Production 00191 through 00191 Advertisement for AirBNB in Israel.
- ☐ LB Supplemental Production 00192 through 00198 Tiffany Lee Charge of Discrimination.
- ☐ LB Supplemental Production 00199 through 00200 Letter from Attison Barnes.
- ☐ LB Supplemental Production 00201 through 00201 Letter to Dave Walton.
- ☐ LB Supplemental Production 00202 through 00209 Letter from Dave Walton.
- ☐ LB Supplemental Production 00210 through 00210 Information related to MEF Response.
- ☐ LB Supplemental Production 00211 through 00215 Handwritten report.
- ☐ LB Supplemental Production 00216 through 00216 Notice of Charge.

- ☐ LB Supplemental Production 00208 through 00237 Emails and information produced by Lisa Barbounis including emails and Greg Roman LinkedIn Page.
- ☐ LB Supplemental Production 00238 through 00290 Emails and information produced by Lisa Barbounis including emails and insurance information for MEF.
- ☐ LB Supplemental Production 00291 through 00299 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00300 through 00304 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00305 through 00345 Electronic messages related to MEF and Daniel Pipes including text messages between Lisa Barbounis and Patricia McNulty sent in real time while Lisa Barbounis was in Israel with Greg Roman.
- ☐ Plaintiff has also produced recordings of Daniel Thomas and Tommy Robinson discussing Greg Roman's illegal offer of money for testimony.
- ☐ Plaintiff has also produced a recording of Alana Goodman describing Greg Roman's sexual harassment including exposing his penis in front of Ms. Goodman and trying to trade sex for stories – including threats.
- ☐ Plaintiff has also produced the comprehensive narrative report of Dr. Zakireh related to the claim of emotional distress made by Lisa Barbounis.
- ☐ Plaintiff has also produced several hundred thousand documents taken from Lisa Barbounis's electronic devices, social media accounts, emails accounts, and cloud based storage accounts. Plaintiff and Defendants received this production at the same time. Accordingly, all documents produced through are equally accessible to Defendants as Plaintiff.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

Plaintiff also identifies all documents produced by Defendants and all medical records and expert reports.

38. Copies of all pictures concerning and/or involving Patricia McNulty at any time after January 1, 2018.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.

- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.
- ☐ MEF Docs 000052 through 000073: text thread between Delaney Yonchek and Patricia McNulty (29 images were also produced that were part of this thread).
- ☐ MEF Docs 000074 through 000103: text thread between Delaney Yonchek, Patricia McNulty, and Lisa Barbounis.
- ☐ MEF Docs 000104 through 000226: text thread between Delaney Yonchek and Lisa Barbounis (146 images were produced that were part of this thread).
- ☐ MEF Docs 000227 through 000461: Articles and documents in connection with The Middle East Forum.
- ☐ MEF Docs 000462 through 000468: text thread between Delaney Yonchek and Marnie Meyer.
- ☐ MEF Docs 000871 through 000874: text thread between Delaney Yonchek, Patricia McNulty, and Caitriona Brady.
- ☐ MEF Docs 000875 through 000877: text thread between Delaney Yonchek, Patricia McNulty, Lisa Barbounis, and Caitriona Brady.
- ☐ MEF Docs 000878 through 000879: text thread between Delaney Yonchek, Caitriona Brady, and Lisa Barbounis.
- ☐ MEF Docs 000880 through 000888: text thread between Caitriona Brady, and Lisa Barbounis and Patricia McNulty.
- ☐ MEF Docs 000889 through 000889: partial transcript from purported telephone call between Matthew Ebert and Greg Roman.
- ☐ MEF Docs 000890 through 000890: Partial text thread between Lisa Barbounis and the MEF Network Administrator.
- ☐ MEF Docs 000891 through 000917: Information related to Declaration of Lisa Barbounis in connection with electronic devices.
- ☐ MEF Docs 000918 through 000919: Email communications.
- ☐ MEF Docs 000920 through 000953 Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000954 through 000961: Email communications.
- ☐ MEF Docs 000962 through 000965: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000966 through 000995: Email communications.
- ☐ MEF Docs 000996 through 000967: Electronic communications related to The Middle East Forum.
- ☐ MEF Docs 000998 through 001002: Handwritten report.

- ☐ MEF Docs 001003 through 001012: Electronic Communications related to The Middle East Forum.
- ☐ MEF Docs 001013 through 001013: Absentee Request.
- ☐ MEF Docs 001014 through 001018: Documents related to Delaney Yonchek.
- ☐ MEF Docs 001015 through 001055 Electronic communications related to The Middle East Forum.
- ☐ LB Supplemental Production 00001 through 00190 The Middle East Forum tax returns for years 2004, 2015, 2016, and 2017 – related to punitive damages.
- ☐ LB Supplemental Production 00191 through 00191 Advertisement for AirBNB in Israel.
- ☐ LB Supplemental Production 00192 through 00198 Tiffany Lee Charge of Discrimination.
- ☐ LB Supplemental Production 00199 through 00200 Letter from Attison Barnes.
- ☐ LB Supplemental Production 00201 through 00201 Letter to Dave Walton.
- ☐ LB Supplemental Production 00202 through 00209 Letter from Dave Walton.
- ☐ LB Supplemental Production 00210 through 00210 Information related to MEF Response.
- ☐ LB Supplemental Production 00211 through 00215 Handwritten report.
- ☐ LB Supplemental Production 00216 through 00216 Notice of Charge.
- ☐ LB Supplemental Production 00208 through 00237 Emails and information produced by Lisa Barbounis including emails and Greg Roman LinkedIn Page.
- ☐ LB Supplemental Production 00238 through 00290 Emails and information produced by Lisa Barbounis including emails and insurance information for MEF.
- ☐ LB Supplemental Production 00291 through 00299 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00300 through 00304 Electronic messages related to MEF and Daniel Pipes.
- ☐ LB Supplemental Production 00305 through 00345 Electronic messages related to MEF and Daniel Pipes including text messages between Lisa Barbounis and Patricia McNulty sent in real time while Lisa Barbounis was in Israel with Greg Roman.
- ☐ Plaintiff has also produced recordings of Daniel Thomas and Tommy Robinson discussing Greg Roman's illegal offer of money for testimony.
- ☐ Plaintiff has also produced a recording of Alana Goodman describing Greg Roman's sexual harassment including exposing his penis in front of Ms. Goodman and trying to trade sex for stories – including threats.
- ☐ Plaintiff has also produced the comprehensive narrative report of Dr. Zakireh related to the claim of emotional distress made by Lisa Barbounis.



- ☐ Plaintiff has also produced several hundred thousand documents taken from Lisa Barbounis's electronic devices, social media accounts, emails accounts, and cloud based storage accounts. Plaintiff and Defendants received this production at the same time. Accordingly, all documents produced through are equally accessible to Defendants as Plaintiff.

Plaintiff reserves the right to amend, supplement, clarify, or add to this production in accordance with the Federal Rules of Civil Procedure, Local Rules of Discovery and the Scheduling Order.

Plaintiff also identifies all documents produced by Defendants and all medical records and expert reports.

39. Copies of all pictures concerning and/or involving Caitriona Brady at any time after January 1, 2018.

Response:

- ☐ MEF Docs 000001 through 000006: text messages between Marnie Meyer and Delaney Yonchek.
- ☐ MEF Docs 000007 through 000009: text messages between Marnie Meyer and Caitriona Brady.
- ☐ MEF Docs 000010 through 000051: Emails and documents produced by Lisa Barbounis from during her employment with The Middle East Forum.
- ☐ MEF Docs 000052 through 000073: text thread between Delaney Yonchek and Patricia McNulty (29 images were also produced that were part of this thread).
- ☐ MEF Docs 000074 through 000103: text thread between Delaney Yonchek, Patricia McNulty, and Lisa Barbounis.
- ☐ MEF Docs 000104 through 000226: text thread between Delaney Yonchek and Lisa Barbounis (146 images were produced that were part of this thread).
- ☐ MEF Docs 000227 through 000461: Articles and documents in connection with The Middle East Forum.
- ☐ MEF Docs 000462 through 000468: text thread between Delaney Yonchek and Marnie Meyer.
- ☐ MEF Docs 000871 through 000874: text thread between Delaney Yonchek, Patricia McNulty, and Caitriona Brady.
- ☐ MEF Docs 000875 through 000877: text thread between Delaney Yonchek, Patricia McNulty, Lisa Barbounis, and Caitriona Brady.
- ☐ MEF Docs 000878 through 000879: text thread between Delaney Yonchek, Caitriona Brady, and Lisa Barbounis.

- ☐ MEF Docs 000880 through 000888: text thread between Caitriona Brady, and Lisa Barbounis and Patricia McNulty.
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- ☐ MEF Docs 001015 through 001055 Electronic communications related to The Middle East Forum.
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40. Copies of all pictures concerning and/or involving Delaney Yonchek at any time after January 1, 2018.

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41. Copies of all pictures concerning and/or involving Marnie Meyer at any time after January 1, 2018.

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42. Copies of the information available on each page of your Facebook account (if you maintain one) from January 1, 2018 to present. To do this, log in to Facebook, click on the down arrow symbol at the top right of your home page and select “Settings;” then, click “Download a copy of your Facebook data” which appears just below your General Account Settings; finally, click “Start My Archive.” Facebook will notify you via email when your page is available for download.

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43. Copies of each page and each picture for all social network accounts (e.g., Ask.fm, Blogspot, BuzzFeed, CafeMom, Classmates, DeviantArt, Facebook, Flickr, Foursquare, Google +, Habbo, Instagram, LinkedIn, LiveJournal, Meet Me, Meetup, MyLife, MySpace, MyYearbook, Periscope, Pinterest, Quora, Reddit, Reunion, Snapchat, Tagged, Tumblr, Twitter, Vine, VK, Windows Live Spaces, YouTube, etc.), posted on from January 1, 2018 to present.

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**DEREK SMITH LAW GROUP, PLLC**

By: /s/ Seth D. Carson  
SETH D. CARSON  
Derek Smith Law Group, PLLC  
1835 Market St, Ste 2950  
Philadelphia, PA 19103  
P: 215-391-4790  
E: [seth@dereksmithlaw.com](mailto:seth@dereksmithlaw.com)  
*Attorneys for Plaintiff*  
*Lisa Barbounis*

DATED: November 3, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on this date that I caused a true and correct copy of Plaintiff's Responses to Defendants' Requests for Admissions to be served via Dropbox.

David J. Walton (PA # 86019)  
Leigh Ann Benson (PA #319406)  
Cozen O'Connor  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103  
P: 215-665-2000  
F: 215-665-2013  
dwalton@cozen.com  
[lbenson@cozen.com](mailto:lbenson@cozen.com)

**DEREK SMITH LAW GROUP, PLLC**

BY: /s/ Seth D. Carson  
SETH D. CARSON

DATED: November 3, 2020

# EXHIBIT C



[10/28/18, 7:51:32 AM] Danny Thomas: Who was on LBC at the time ?

[10/28/18, 7:51:52 AM] Lisa: Matt Stadlen?

[10/28/18, 7:52:19 AM] Lisa: He's a dick. I was half awake.

[10/28/18, 7:52:38 AM] Lisa: I gave it to him though. As olivia and not lisa

[10/28/18, 12:58:45 PM] Danny Thomas: Hahaha brilliant ! Tommy rang me earlier wants me to help create an online platform for his website. So hopefully we be getting the ball rolling soon on that

[10/30/18, 2:41:07 PM] Danny Thomas: <attached: 00000297-PHOTO-2018-10-30-14-41-07.jpg>

[10/30/18, 2:41:12 PM] Danny Thomas: <attached: 00000298-PHOTO-2018-10-30-14-41-12.jpg>

[10/30/18, 2:41:18 PM] Danny Thomas: You seen this shit !!!

[10/30/18, 2:41:33 PM] Lisa: Yup.

[10/30/18, 2:41:39 PM] Lisa: <attached: 00000301-PHOTO-2018-10-30-14-41-39.jpg>

[10/30/18, 2:42:08 PM] Lisa: Read that shit. If that happens after I have busted my ass on this side to get it approved I'm going to go insane.

[10/30/18, 2:42:30 PM] Danny Thomas: Fuck !!!

[10/30/18, 2:42:51 PM] Lisa: I'm so mad at my boss.

[10/30/18, 2:42:54 PM] Danny Thomas: Do you think it will happen, what's the word on the street your end.

[10/30/18, 2:43:09 PM] Danny Thomas: I bet you are, shouldn't of released it

[10/30/18, 2:43:13 PM] Lisa: I actually do think it will get approved but not until the last minute

[10/30/18, 2:43:18 PM] Danny Thomas: Gives them time to try and stop it

[10/30/18, 2:43:23 PM] Lisa: But then the home office has the right to him he can't go

[10/30/18, 2:44:15 PM] Danny Thomas: Well if that happens it will cause a storm for sure, I think they can't afford another fuck up their end. Let's just wait and see, what's the dates he need to be there for ?

[10/30/18, 2:44:39 PM] Danny Thomas: How are you anyway, you all good ?

[10/30/18, 2:45:13 PM] Lisa: After his trip here I'm quitting my job and looking for another one.

[10/30/18, 2:45:28 PM] Lisa: Maybe in London Hahhahaha

[10/30/18, 2:45:38 PM] Danny Thomas: What !!!!! Lisa why ?????

[10/30/18, 2:45:46 PM] Danny Thomas: Yer fuck it do it

[10/30/18, 2:45:48 PM] Lisa: I fucking hate my boss Gregg

[10/30/18, 2:45:53 PM] Lisa: Hate him.

[10/30/18, 2:46:16 PM] Lisa: It's a long story

[10/30/18, 2:51:43 PM] Danny Thomas: Jesus it's all going on, I hope your ok. Your the backbone of all this Lisa, they should of listened to you in the first place. But I know your doing all you can for Tommy, if there is anything I can do. Let me know x

[10/30/18, 5:48:27 PM] Danny Thomas:  
[https://m.facebook.com/story.php?story\\_fbid=1974007082900312&id=1826260964341592](https://m.facebook.com/story.php?story_fbid=1974007082900312&id=1826260964341592)

[10/30/18, 5:48:42 PM] Danny Thomas: Great video this !! The revolution is coming

[10/31/18, 4:25:38 PM] Lisa: When we had Wilders come you were in direct contact with his security people, correct?

# EXHIBIT D

[11/4/18, 2:03:10 PM] Danny Thomas: <attached: 00000410-AUDIO-2018-11-04-14-03-10.opus>

[11/4/18, 2:08:27 PM] Lisa: Sandbags

[11/4/18, 2:11:51 PM] Lisa: We in the West have different notions of free speech. I think he should be able to say whatever he wants and ppl like you should just go down there and expose them until the truth is illuminated. That's the beauty of free speech.

[11/4/18, 2:12:08 PM] Lisa: Not west - the US

[11/4/18, 2:16:18 PM] Lisa: Watched the whole thing. You were

[11/4/18, 2:30:52 PM] Danny Thomas: <attached: 00000415-AUDIO-2018-11-04-14-30-52.opus>

[11/4/18, 2:31:27 PM] Lisa: I got that. And then you need to keep that up.

[11/4/18, 7:45:52 PM] Danny Thomas: I've got the upcoming online news outlet covering next week's Telford visit, the aim is to have 5k - 7k charity event which I mentioned before. We will raise a shit load of cash for these charity's to develop themselves with Tommy as the face. I'm interested to see how things develop with Gregg I really hope the right thing happens and he leaves.... A stable charity network for these young girls. Followed by a Political movement, we need a party and we need one quick !! UKIP seems the sort of safe option !!

[11/4/18, 8:02:16 PM] Lisa: We have a meeting tomorrow. Keep the Gregg stuff very quiet. I have an NDA that I have to sign tomorrow about it. I told you prior but still. I'll keep you updated. After the meeting my sole mission this week is getting Tommy here. I won't be working on much else.

[11/5/18, 3:21:28 AM] Danny Thomas: Of course

[11/6/18, 1:14:48 PM] Lisa: You have Ann Marie waters contact info

[11/6/18, 3:00:15 PM] Danny Thomas: I can get it, no problem. Sort it for you in the morning

[11/6/18, 3:07:18 PM] Lisa: Tommy said he was working on it. All good

[11/6/18, 3:14:39 PM] Danny Thomas: See if I can sort it quick give me 10

[11/6/18, 3:14:50 PM] Lisa: Tommy has it

[11/6/18, 3:14:55 PM] Lisa: All good

[11/6/18, 3:15:01 PM] Lisa: I don't need you to

[11/6/18, 3:15:33 PM] Danny Thomas: I've just asked him to send it to you

[11/6/18, 3:15:43 PM] Danny Thomas: He takes ages to do anything

[11/6/18, 3:15:48 PM] Lisa: Thanks

[11/6/18, 3:16:48 PM] Danny Thomas: He's listen to the voice note, he will send them over lol how's you anyway you good ?

[11/6/18, 3:21:59 PM] Lisa: It's been a rough few days. I basically got rid of my own position. Gregg is gone from the office and may be gone entirely. Only time will tell. I'm not working with him so there isn't much for me to do. They let me keep the Tommy project and fired the online editor and gave me that job for now until they see if Gregg is going to manage the other projects. If not I may get that. Time will tell. But he's out of the office and stripped of his authority. He may retain the title so the organization saves face.

[11/6/18, 3:22:30 PM] Lisa: Other than that I'm a little sad and tired. It's been a long long weekend.

# **EXHIBIT E**

**2019-07-18 17:47:01 UTC: 12159102154@s.whatsapp.net -> [7 recipients]**

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**From:** Lisa <12159102154@s.whatsapp.net>

**To:** Tommy Robinson <447510678118@s.whatsapp.net>, Ashley Ward <447932017833@s.whatsapp.net>, Nem Adam Tommy <447791383097@s.whatsapp.net>, Avi Yemeni <61421908412@s.whatsapp.net>, Tommy Robinson <447729634251@s.whatsapp.net>, Ashley Ward <447483319547@s.whatsapp.net>, Andre <447515758758@s.whatsapp.net>

**Date:** Thu, 18 Jul 2019 13:47:01 -0400

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Can we telegram this?

# **EXHIBIT F**

**2019-10-06 16:07:23 UTC: 12159102154@s.whatsapp.net -> [7 recipients]**

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**From:** Lisa <12159102154@s.whatsapp.net>

**To:** Tommy Robinson <447510678118@s.whatsapp.net>, Ashley Ward <447932017833@s.whatsapp.net>, Nem Adam Tommy <447791383097@s.whatsapp.net>, Avi Yemeni <61421908412@s.whatsapp.net>, Tommy Robinson <447729634251@s.whatsapp.net>, Ashley Ward <447483319547@s.whatsapp.net>, Andre <447515758758@s.whatsapp.net>

**Date:** Sun, 06 Oct 2019 12:07:23 -0400

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Never mind I see it in telegram

# **EXHIBIT G**



**2019-07-20 07:12:45 UTC: +12159102154@iMessage -> [3 recipients]**

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**From:** Home <+12159102154@imessage>  
**To:** Home <" +1 215-910-2154">, Tricia McNulty <" +1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Sat, 20 Jul 2019 03:12:45 -0400

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You are likely sleeping but did you see the Telegram from Marc. Is he fucking serious?!

# EXHIBIT H

**2018-11-01 14:11:00 UTC: +1 856-803-8401 -> [+12159102154]**

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**From:** Marnie Meyer <"+1 856-803-8401">  
**To:** Home <+12159102154>  
**Date:** Thu, 01 Nov 2018 10:11:00 -0400

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The die is cast. I'm pretty sure we can talk to each other now. Who cares what the think while the shit is hitting the fan. Let's take a walk and I'll show you the email and the telegram

# **EXHIBIT I**

**2019-04-17 19:47:44 UTC: +1 609-742-1968 -> [+1 215-910-2154, lisarey@sas.upenn.edu]**

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**From:** Tricia McNulty <" +1 609-742-1968" >  
**To:** Home <" +1 215-910-2154" >, Home <lisarey@sas.upenn.edu>  
**Date:** Wed, 17 Apr 2019 15:47:44 -0400

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Gregg just sent such an annoying/condescending telegram to me because I sent an email to a donor and donations group with a copy editing error. Then five minutes later he sent a doc to me dp and Marc and I called out a copy editing error. Muahahahaha. Made me feel better